

Western Union's Human Rights Statement

Introduction

At Western Union, our purpose is moving money for better. We connect businesses, financial institutions, governments, and consumers around the world – leveraging our cross-border platform and leading global financial network to build bridges across economies, geographies, and cultures. Our shared values, to be Purpose Driven, Globally Minded, Trustworthy and Respectful, reflect how we work. This Statement explains Western Union's approach to respecting and promoting human rights, including those of our employees, customers and consumers, and society at large, as well as the expectations we have of our business partners (e.g. our suppliers, vendors, agents and contractors) to share our values with respect to human rights. It applies to The Western Union Company and our subsidiaries.

Our Commitment

Western Union is committed to respecting and promoting human rights guided by internationally recognized standards, such as the [Universal Declaration of Human Rights](#), the [International Labour Organization's Declaration on Fundamental Principles and Rights at Work](#), and the [UN Guiding Principles on Business and Human Rights](#). We aim to:

- avoid causing or contributing to negative human rights impacts;
- prevent or mitigate negative human rights impacts that occur in our operations and through those of our business partners; and
- promote human rights by contributing to the global communities we serve.

Western Union serves customers in over 200 countries and territories. We comply with international laws and local legal requirements in the countries and territories in which we operate. In geographies where we believe the local law, regulation, or practice falls below international human rights standards, we strive to adhere to international standards in a way that reflects our purpose. If we become aware one of our partners is not adhering to our values, we will attempt to work with the partner to correct the situation, balancing the interests of customers and consumers. If the partner does not work to implement actions to correct the situation, we may modify, limit, or terminate our relationship with that partner.

Key Areas of Impact

Our global network extends to many remote locations and developing economies, enabling us to play a critical role in contributing to economic growth and cross-border trade. We also play a vital role in serving vulnerable communities around the world, including migrants, and communities in zones afflicted by conflict or natural disaster. We believe providing services to these communities reflects our commitment to supporting human rights in these communities and across the globe.

With the support of an external expert, we conducted an assessment that helped us identify and prioritize the human rights impacts that most relate to our business and our business partners, and develop mitigation and remediation strategies to address the impacts we identified. We examined impacts on our key stakeholders – our employees, our customers and communities, and our business partners. Some of the impacts we identified include customer and consumer data privacy and protection and the wrongful use of our network by illicit actors to facilitate human trafficking and other human rights abuses that harm individuals and communities. We recognize

some human rights impacts are inherent risks of our role as a money movement and payments service provider, and some human rights impacts are due to external, contextual factors – such as conflict, weak rule of law, and the uneven application of the law – in the geographies where we operate. As these impacts may change over time, we plan to continually improve our human rights approach through periodic human rights due diligence and monitoring.

Our Employees

Our employees are our most valuable asset. As our [Code of Conduct](#) details, we are committed to maintaining a safe environment where our values of trust and respect are our guides, and intimidation, harassment and abuse have no place. We monitor political and security conditions in high-risk geographies where our employees are physically present. We also aim to support the mental well-being of our employees, especially during times of crisis or change.

We believe different perspectives spark innovation and growth. We strive to promote a work culture that is supportive of all people and employs fair and equitable practices on hiring, promotion and pay. Details about our approach to diversity, equity, and inclusion can be found in our latest [Environmental, Social and Governance \(ESG\) Report](#).

Our Communities, Customers and Consumers

We strive to treat our customers and consumers with integrity regardless of who or where they are, or the amount of business they do with us. We have specific policies and procedures when it comes to information security, privacy, and law enforcement requests. These explain how customer and consumer data is managed and protected. As part of our approach, we regularly conduct privacy risk assessments and information security risk assessments to protect our customers and consumers' privacy and data. In addition, our Global Consumer Anti-Fraud Program aims to protect customers and consumers from becoming victims of fraud, and to prevent criminals from using our systems for fraudulent schemes.

Western Union also proudly stands with and supports the migrant community. They are not only valued customers, but are key to the success of the communities they join. We recognize the social and economic challenges that some migrant workers, ethnic and religious minorities and marginalized groups may encounter, and our goal is to make our products and services accessible for those who need them.

Our Network

Millions of people transact through Western Union. We know, however, that some may seek to use our network to make payments that facilitate human trafficking, drug trafficking, terrorism, or other illicit purposes. In particular, we condemn all forms of human trafficking and devote significant resources to our global Anti-Human Trafficking initiative.

More broadly, our global compliance program is designed to detect, deter, prevent, and report illicit activity and abuse of our systems, in order to protect Western Union, our customers and consumers, our business partners, and communities. We have developed bespoke tools, such as algorithms to detect and stop, in real-time, potentially illicit transactions. In addition, we maintain and regularly update a policy that sets out limits and special procedures to be followed when considering whether to enter or continue a relationship with persons or

companies involved in certain types of activity, some of which have heightened risks of negative human rights impacts. We also implement various due diligence, screening and oversight procedures (e.g., ongoing due diligence of the Western Union agent network, transaction monitoring procedures, and “know your customer” due diligence) to help us thwart attempts to use Western Union’s products and services in ways that contravene laws and regulation. For more information, see our latest [Modern Slavery and Human Trafficking Statement](#) and our latest [ESG Report](#).

Our Business Partners

Our vendors, suppliers, agents and contractors are critical to enabling us to deliver our products and services. We expect these business partners to operate with integrity and in compliance with applicable laws and regulations. We utilize our sourcing and procurement policies, due diligence processes for vendors and agents and ongoing engagement to help ensure our partners are respecting the rights of their workers and other key stakeholders.

Promoting Human Rights

We strive to promote human rights by providing important financial services across the globe. As a company with a vast retail and digital network, Western Union has unique insight into customers and communities around the world. We recognize that while society is becoming more connected, a significant portion of the world’s population remains offline, and many people do not have access to financial services. Pairing our digital network and account and mobile wallet offerings with our retail network allows us to serve a broad spectrum of customers, including rural communities with limited broadband and mobile connectivity, and people who may not have access to other financial services.

In addition, Western Union and the Western Union Foundation have a long history of supporting migrants and refugees who represent our customers, workforce and communities. Through the foundation, we actively engage in advocacy, and provide sponsorships and grants supporting migrants, refugees, and others who have been forcibly displaced. For more details about our work promoting human rights, see our latest [ESG Report](#).

Governance and Communication

Western Union’s governance and management practices are founded on principles of accountability, honesty, integrity, fairness, reliability, and security. We have created a cross-functional Human Rights Working Group to support the development and maintenance of our human rights statement, as well as a governance model that will coordinate our efforts to identify, and address human rights risks and opportunities.

This Statement and our latest [ESG Report](#) and [Modern Slavery and Human Trafficking Statement](#) illustrate our human rights commitment and our approach to understanding and addressing human rights risks.

How to Raise Concerns

Western Union maintains a secure and confidential Ethics Helpline, a reporting channel through which our employees, customers, suppliers, vendors, agents, communities and other stakeholders can raise concerns—including concerns related to human rights impacts—via web or phone. The Helpline is operated by a third-party provider, which enables individuals to report concerns anonymously where permitted by local law. Western Union reviews the concerns raised and, as appropriate, conducts an investigation and takes action. Western Union

explicitly prohibits retaliation against employees who report concerns or cooperate in investigations in good faith. The Helpline is available 24 hours a day, every day. The web-based reporting tool is available to individuals in six languages while the toll-free phone line supports calls in over 150 languages.

The Helpline's web-based reporting tool and toll-free hotline can be accessed as follows:

Telephone number for the United States: 1-844-893-1078

Telephone numbers outside of the United States: wuethicshelpline.com

Website access: wuethicshelpline.com

Our [Code of Conduct](#) provides additional details about our Helpline.

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